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8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

11 METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

12 Plaintiff,

13 vs.

14 ACDF, LLC, a California limited liability
15 company, et al.,

16 Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-
01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-
cv-01235; and 1:24-cv-01241

**SUPPLEMENT TO RECEIVER'S
MOTION FOR APPROVAL OF SALE
PROCEDURES RE: MINUTE ORDER
DATED MARCH 6, 2025 [ECF NO. 112]**

Hearing:

Date: March 17, 2025

Time: 1:30 p.m.

Place: Robert E. Coyle U.S. Courthouse
2500 Tulare Street
Courtroom 6, 7th Floor
Fresno, CA 93721

- 17 ☒ Affects All Cases
- 18 ☐ Affects Metropolitan Life Ins. Co. v.
- 19 ACDF, LLC, et al., 1:24-cv-01261
- 20 ☐ Affects Metropolitan Life Ins. Co. v.
- 21 FNF Farms, LLC, et al., 1:24-cv-01226
- 22 ☐ Affects Metropolitan Life Ins. Co. v. C
- 23 & A Farms, LLC, et al., 1:24-cv-01230
- 24 ☐ Affects Metropolitan Life Ins. Co. v.
- 25 Maricopa Orchards, LLC, et al., 1:24-
- 26 cv-01231
- 27 ☐ Affects Brighthouse Life Ins. Co. v.
- 28 Kamm South, LLC, et al., 1:24-cv-
- 01232
- ☐ Affects Brighthouse Life Ins. Co. v.
- Manning Avenue Pistachios, LLC, et
- al., 1:24-cv-01233 Case No. 1:24-cv-
- 01233

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- ☐ Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
- ☐ Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

Phillip Christensen, as Receiver (the “Receiver”), hereby submits this supplemental reply in support of his *Motion for Approval of Sale Procedures* (ECF No. 101) (the “Motion”),¹ only with respect to the Court’s Minute Order dated March 6, 2025 (the “Minute Order”), as follows:

1. The Motion before the Court is for approval of the Sale Procedures. Additional notice to interested parties with respect to each sale of each of the Subject Properties is contemplated by the Sale Procedures in Motion.

2. As set forth in the Motion, the Receiver does not request authority to sell free and clear of any liens or interests other than the consensual liens. See Motion and page 10, lines 1-6.

3. In response to the Minute Order, the Receiver is contemporaneously herewith filing and serving supplemental notice of the hearing on the Motion to all parties listed on title reports with respect to the Subject Properties, to the extent mailing addresses are available.

4. The supplemental declaration of Zev Shechtman also filed contemporaneously herewith describes the process for preparing that supplemental service list.

The Receiver respectfully requests: (A) that the Court approve the form of supplemental notice filed contemporaneously herewith; (B) grant the Motion in its entirety; and (C) enter such other and further relief the Court deems just and proper in the circumstances.

DATED: March 10, 2025

SAUL EWING LLP

By:

ZEV SHECHTMAN

Attorneys for Phillip Christensen, as Receiver

¹ Unless stated otherwise, defined terms are the same as in the Motion.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is: **Saul Ewing 1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

A true and correct copy of the document entitled: **Supplement to Receiver's Motion for Approval of Sale Procedures re: Minute Order Dated March 6, 2025 [ECF NO. 112]** will be served or was served on the judge in chambers in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING

(NEF): The foregoing document will be served by the court via NEF and hyperlink to the document. On **March 10, 2025**, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **March 10, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 on **March 10, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 10, 2025	Hannah Richmond	/s/ Hannah Richmond
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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2. SERVED BY UNITED STATES MAIL (continued):

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Fresno, CA 93704	
Ashlan & Hayes Investments, LLC	Grantor Fresno Clovis Investments, LLC
c/o Agent for Service of Process	c/o Agent for Service of Process
John A. Bezmalinovic, General Counsel	John A. Bezmalinovic, General Counsel
The Assemi Group	The Assemi Group
5260 N. Palm Ave., Suite 421	5260 N. Palm Ave., Suite 421
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Dirk B. Paloutzian	
Natalya M. Ferdinandi	
Baker Manock & Jensen, PC	
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Fresno, California 93704	

1 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**
2 **TRANSMISSION OR EMAIL (continued) :**

3 **VIA EMAIL:**

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